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District of Nevada

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case Nos: 2:13-CV-00100-(APG)-(CWH)
)	And
v.)	2:13-CV-00947-(JCM)-(GWF)
)	
\$1,002,327.00 IN UNITED STATES)	
CURRENCY, et. al.,)	
)	
Defendants.)	

PARTIES STIPULATED MOTION TO CONTINUE THE DISCOVERY

COME NOW the parties, the plaintiff United States of America, by and through the United States Attorney for the District of Nevada, and the Claimants by and through their attorneys David McGee and Gregory Miller, and moves this Court to grant a continuance of discovery in the above-referenced matters for 90 days, or until September 15, 2015. Discovery cut-off in these cases is June 15, 2015. For their grounds, the parties jointly represent that they have been engaged in “paper” and deposition discovery to date. Currently the parties are engaged in discovery disputes that are under consideration by this Court. Once those disputes have been resolved, discovery can resume. Resolution of those discovery issues is not likely to occur before the discovery cut-off of June 15, 2015.

1 On June 9, 2015, Counsel for the Claimants, David McGee, sent an e-mail to the undersigned
2 counsel for the Government, giving his (Mr. McGee's) consent on behalf of the Claimants to continue
3 the discovery cut-off deadline for an additional 90 days or until September 15, 2015.

4 This motion is not submitted solely for the purpose to delay or for any other improper purpose.

5 WHEREFORE, the United States moves this Court to grant a 90-day continuance, or until
6 September 15, 2015, to complete discovery.

7 DATED this 12th day of June 2015.

8
9 Respectfully submitted,

10 DANIEL G. BOGDEN
United States Attorney

11 /s/Michael A. Humphreys
12 MICHAEL A. HUMPHREYS

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15 IT IS SO ORDERED:

16 George Foley Jr.
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: June 15, 2015
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PROOF OF SERVICE

I, Mary Stolz, Forfeiture Support Associates Paralegal, certify that the following individuals were served with copies of the PARTIES STIPULTED MOTION TO CONTINUE THE DISCOVERY on May 19, 2015, by the below identified method of service:

Via CM/ECF

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/s/ Mary Stolz
MARY STOLZ
Forfeiture Support Associates Paralegal